



THE CITY OF NEW YORK
LAW DEPARTMENT

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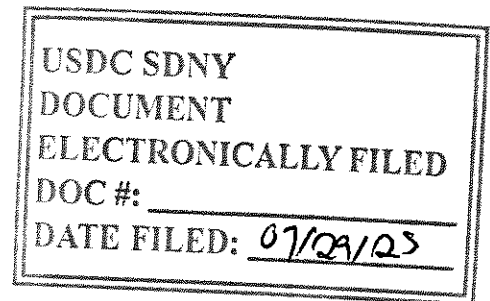
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July 25, 2025

VIA ECF

Honorable Lewis A. Kaplan
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Christian Waller v. City of New York, et al.,
21 Civ. 209 (LAK)



Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, representing defendants City of New York and Kurwin Klien ("defendants") in the above-referenced matter. The undersigned respectfully writes on behalf of the parties to request a (15) day extension of the deadline to file a joint pretrial order ("JPTO") in this matter, from July 28, 2025 to August 12, 2025. This is the parties' first such request and is made after reviewing Your Honor's Individual Rules regarding the filing of a JPTO at the same time as dispositive motions. The parties apologize for missing Your Honor's extension deadline of July 24, 2025, which resulted due to a misapprehension regarding the need for a JPTO given defendants' anticipated Motion for Summary Judgment.

By way of background, defendants submitted, on consent, a request for a fifteen (15) day extension of the deadline to file dispositive motions in this matter, from July 28, 2025 to August 12, 2025, but, in an oversight, did not include a corresponding request to extend the deadline for the filing of a JPTO. The parties therefore jointly request that the deadline for the parties to file a JPTO be extended to the same proposed date for the filing of dispositive motions, namely August 12, 2025.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Jonathan Hutchinson

Jonathan Hutchinson

Senior Counsel

cc: VIA ECF
Sameer Nath, Esq.
Attorney for Plaintiff

SO ORDERED


LEWIS A. KAPLAN, USDJ

07/29/25